

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re:	:	Bankruptcy No. 22-20098 CMB
James L. Sabin, Jr.	:	Chapter 13
Pamela A. Sabin	:	Related to Docket No. 29
Debtors	:	
	:	
James L. Sabin, Jr.	:	
Pamela A. Sabin	:	
Movants	:	
	:	
v.	:	
Loan Care, LLC	:	
Respondent	:	

**MOTION TO APPROVE PERMANENT LOAN MODIFICATION WITH LOANCARE,  
LLC OBTAINED THROUGH THE LOSS MITIGATION PROGRAM**

AND NOW, comes the Debtors, James L. & Pamela A. Sabin by and through their attorney, Kenneth Steidl, and Steidl and Steinberg, and respectfully represents as follows:

- 1) This case was commenced on January 18, 2022 when the Debtors filed a voluntary petition under Chapter 13 of the Bankruptcy Code.
- 2) The Debtors applied for the Loss Mitigation Program through the United State Bankruptcy Court for the Western District of Pennsylvania and have been approved for a final loan modification.
- 3) The terms of the new loan modification are as follows:
  - a) The new balance owed is \$142,607.24
  - b) The interest rate is now 4.375%.
  - c) The principal and interest payment is \$642.94 per month, the The Escrow payment is \$454.79 per month. This yields a new monthly mortgage payment of \$1097.73 per month.
  - d) Maturity date is August 1, 2062
  - e) The effective date is September 1, 2022.
- 4) A chart comparing the terms of the original loan and the modified loan is attached hereto, made a part hereof and labeled Exhibit "A".
- 5) A copy of the Proposed Loan Modification Agreement is attached hereto, made a part hereof and labeled Exhibit "B".
- 6) A copy of the Portal Account History is attached hereto, made a part hereof and labeled Exhibit "C".
- 7) An amended plan will be filed once this loan modification has been approved by this Honorable Court.

WHEREFORE, the Debtors, James L. & Pamela A. Sabin, respectfully requests that this Honorable Court approve this loan modification agreement with LoanCare, LLC.

Respectfully submitted,

Date of Service: October 19, 2022

/s/ Kenneth Steidl

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